



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

NOV 28 2016

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7647 3408**

**RETURN RECEIPT REQUESTED**

Mr. Arinze Nwamba  
Senior Environmental Engineer  
Stanley Electric U.S. Co., Inc.  
420 East High Street  
London, Ohio 43140

Re: Notice of Violation  
Compliance Evaluation Inspection  
EPA ID Number: OHD034909358

Plant 1  
420 East High Street  
London, Ohio 43140

Plant 2  
480 East High Street  
London, Ohio 43140

Dear Mr. Nwamba:

On August 17, 2016 a representative of the U.S. Environmental Protection Agency inspected the Stanley Electric U.S. Co., Inc. ("Stanley") facilities ("Plant 1" and "Plant 2") located in London, Ohio. As a large quantity generator of hazardous waste, is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate Stanley's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Stanley, on EPA's review of records pertaining to Stanley, and on the inspector's observations, EPA has determined that Stanley has unlawfully stored hazardous waste without a permit or interim status. Stanley failed to comply with certain conditions for a permit exemption under Ohio Admin. Code § 3745-52-34(A)-(C) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Stanley was out of compliance at the time of the inspection in paragraph 1, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSDF requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSDF requirement. The exemption conditions identified in paragraph 2 is also an independent TSDF

requirement incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256. Accordingly, each failure of Stanley to comply with these conditions is also a violation of the corresponding requirement in Ohio Admin. Code chs. 3745-65 to 68 and 3745-256 [40 C.F.R. part 265] (if the facility should have fully complied with the requirements for interim status), or Ohio Admin. Code chs. 3745-54 to 57 and 3745-205 [40 C.F.R. part 264] (if the facility should have been permitted).

Lastly, EPA has determined that Stanley violated RCRA requirements related to waste determinations and universal waste, as described in paragraphs 3-4, below.

#### **STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSDF REQUIREMENTS**

At the time of the inspection, Stanley was out of compliance with the following large quantity generator permit exemption conditions:

##### **1. Satellite Container Management**

A generator may accumulate as much as fifty-five gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit and without complying with paragraph Ohio Admin. Code § 3745-52-34 (A) or (D) [40 C.F.R. § 262.34(a) and (d)] of this rule provided, among other things, the generator marks the containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers. See, Ohio Admin. Code § 3745-52-34(C)(1)(b) [40 C.F.R. § 262.34(c)(1)(ii)].

##### **Plant 1**

At the time of the inspection, one satellite 5-gallon container of waste in a waste collection area associated with the Hard-coat / Anti-fog line was not labeled with the words "Hazardous Waste" or with other words identifying the contents of the container.

One satellite 5-gallon container associated with Line 5 was also not labeled with the words "Hazardous Waste" or with other words identifying the contents of the container.

The waste in the 5-gallon satellite container at Line 5 is taken to a 55-gallon drum in a separate area called Satellite Accumulation Area #20, which is not at or near this point of generation. The drum was labeled as "Hazardous Waste," but was not marked with a start date of accumulation. This container was not being managed as a 90-day storage container.

Lastly, a 55-gallon drum located in Satellite Accumulation Area #13 held absorbent rags contaminated with trichloroethylene. The rags are generated in the Die-Mold room. The drum was labeled as "Hazardous Waste," but was not marked with a start date of accumulation. This container was not at or near the point of generation, and was not being managed as a 90-day storage container.

## Plant 2

One 55-gallon drum of liquid hazardous waste and one 55-gallon drum of hazardous waste solids were located in a flammable-proof cabinet in a maintenance area located approximately 75-100 feet from the "Clean Room." This cabinet was located in the general area that was accessible to all employees in the plant and was not at or near a point of generation. The drums were closed and labeled as "Hazardous Waste," but the containers were not marked with start dates of accumulation and were not managed as 90-day accumulation containers.

**The permit exemption condition identified below in paragraph 2 is also an independent TSDF requirement violated by Stanley:**

### 2. Contingency Plan Requirements

Under Ohio Admin. Code §§ 3745-52-34(A)(4) and 3745-65-52(D) [40 C.F.R. §§ 262.34(a)(4) and 265.52(d)], a large quantity generator must have a contingency plan for the facility which lists names, addresses, and phone numbers of all persons qualified to act as emergency coordinator, and this list must be kept up to date.

At the time of the inspection, Stanley had a contingency plan in place. The plan had not been revised to name Arinze Nwamba as a new coordinator. The plan was under revision at the time of the inspection, and Mr. Nwamba stated that this correction was part of the revision.

**Summary of exemption conditions:** By failing to comply with the conditions for a permit exemption, above, Stanley became an operator of a hazardous waste storage facility, and was required to obtain an Ohio hazardous waste storage permit. Stanley failed to apply for such a permit. Stanley's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ohio Admin. Code §§ 3745-50-45(A) and 3745-50-41(A) and (D) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256 is also an independent violation of the corresponding TSDF requirement.

## **WASTE DETERMINATION AND UNIVERSAL WASTE VIOLATIONS**

Stanley violated the following generator requirements:

### 3. Hazardous Waste Determination

Under Ohio Admin. Code § 3745-52-11 [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous. Records of these determinations must be kept for three years from the last date the waste is shipped off-site. See, Ohio Admin. Code § 3745-52-40(C) [40 C.F.R. § 262.40(c)].

At the time of the inspection, Stanley was managing spent oil as a non-hazardous waste, not as used oil. Documentation supporting the non-hazardous waste determination for the oil was not available for review.

Also, used lamps are crushed in an on-site drum-top crushing mechanism. The crushed glass is discarded as non-hazardous waste. The filter on the mechanism is discarded as hazardous waste for mercury. The whole lamps are currently managed as universal waste. A container of lamps next to the crusher was marked as "Universal Waste" and dated from 8-5-2-16. Objects managed as universal waste must first be hazardous waste. Documentation supporting a hazardous (or non-hazardous) waste determination for the whole lamps was not available for review.

Please note, treatment of universal waste is prohibited under Ohio Admin. Code § 3745-273-11(B) [40 C.F.R. § 273.11(b)].

#### 4. Universal Waste Requirement

Under Ohio Admin. Code § 3745-273-14(A) [40 C.F.R. § 279.14(a)], a small quantity handler of universal waste must label or clearly mark each battery or each container or package in which such batteries are contained with any one of the following phrases: "Universal Waste-Battery(ies)," "Waste Battery(ies)" or "Used Battery(ies)."

At the time of the inspection, Stanley had one tote of lead-acid batteries and one additional container of lithium-ion batteries in the waste storage area. Neither container was marked as labeled above.

The tote of lead-acid batteries was labeled prior to the end of the inspection. No further action is requested for that container.

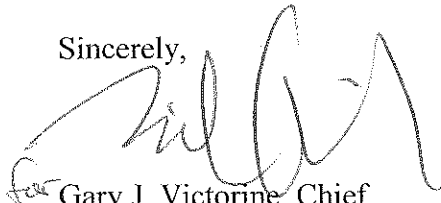
### CONCLUSION

At this time, EPA is not requiring Stanley to apply for an Ohio hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 and 2, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Brenda Whitney, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Whitney, of my staff, at 312-353-4796 or at [whitney.brenda@epa.gov](mailto:whitney.brenda@epa.gov).

Sincerely,

  
for Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Daniel Dimeo, OEPA ([Daniel.dimeo@epa.ohio.gov](mailto:Daniel.dimeo@epa.ohio.gov))  
Mitch Mathews, OEPA ([Mitchell.Mathews@epa.ohio.gov](mailto:Mitchell.Mathews@epa.ohio.gov))



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

**Date of Inspection:** August 17, 2016

**Facility Name:** Stanley Electric U.S. Co., Inc.

**Facility Address:** Plant 1  
420 East High Street  
London, Ohio 43140  
  
Plant 2  
480 East High Street  
London, Ohio 43140

**EPA RCRA ID Number:** OHD034909358

**Generator Status:** Large Quantity Generator

**Facility Contact:** Arinze Nwamba  
Senior Environmental Engineer

**U.S. EPA RCRA Inspector:** Brenda Whitney - Environmental Engineer  
Land and Chemicals Division  
Resource Conservation and Recovery Act (RCRA) Branch  
Compliance Section 2

**Prepared By:**

  
Brenda Whitney – Environmental Engineer

10/5/16  
Date

**Approved By:**

  
Julie Morris – Chief, Compliance Section 2

10/11/16  
Date

## **Purpose of Inspection**

I conducted an unannounced Compliance Evaluation Inspection (CEI or “Inspection”) of the Stanley Electric U.S. Co., Inc. (“Stanley”) facility located in London, Ohio, on August 17, 2016. This CEI was an evaluation of Stanley’s compliance with the RCRA hazardous waste regulations codified in the Ohio Administrative Code and the Code of Federal Regulations. The Facility has notified as a large quantity generator of hazardous waste generating more than 1,000 kilograms of hazardous waste in any month. The Director of the Ohio Environmental Protection Agency declined participation in this CEI.

## **Participants**

Arinze Nwamba – Senior Environmental Engineer	Stanley
Jeff Kitchen – Facility Engineering Manager	Stanley
Brenda Whitney – Environmental Engineer	U.S. EPA

## **Introduction**

Stanley is separated into two facilities that have two different addresses, but are not separated by a public right-of-way. These two facilities share one EPA identification number, and the wastes generated at Plant 2 are shipped over to Plant 1 for staging prior to shipment off-site. I was provided documentation showing that this arrangement has been discussed with and approved by the Ohio EPA. I first arrived at Plant 2, which is not the main facility. I was able to contact Mr. Nwamba and Mr. Kitchen who were at Plant 1. They drove over and escorted me to Plant 1. I returned to inspect Plant 2 at the end of the inspection on the 18th.

Upon arrival at Plant 1, I signed in at the front desk and was provided with a dissipative baseball cap which was to be worn throughout the plant. We proceeded to a conference room for an introductory meeting. I delineated the purpose and logistics of the CEI, and I informed the representatives that I would be taking photographs during the CEI as needed. We discussed the procedures EPA uses for controlling confidential business information (CBI). I provided the following compliance assistance documents: *Onsite Pollution Prevention Assistance (OEPA brochure)*; *P2 Technical Assistance Contacts*; and *U.S. EPA Small Business Resources*. The Stanley representatives provided me with an overview of their manufacturing processes, waste generation sources, and waste management methods. I was then escorted on a walking tour of the facility. I held a partial close-out meeting with Stanley representatives at the end of the day. I returned the following day to review records and to inspect Plant 2. Upon completion of the CEI on the 18th, I held a closing conference with Mr. Nwamba and Mr. Kitchen.

## **Site Description**

The following information about Stanley is based on the personal observations of the EPA inspector and on representations made during the inspection by the Facility personnel identified above or within the text unless otherwise noted.



#### Facility Background Information:

- Stanley Electric is a Japanese-based company with three independent facilities in the U.S. under the Stanley Electric umbrella.
- Stanley Electric includes approximately 30 facilities world-wide.
- Stanley is permitted under MACT, NPDES, Stormwater, SPCC, and Wastewater Discharge Industrial User to the City of London.
- 1629 Employees work typically 6 days a week in rotating shifts.
- Plant 1
  - Automotive lighting manufacturing (i.e., injection molding and coatings) and assembly.
  - Large Quantity Generator.
  - Operates 70 injection molding machines.
  - Operates 12 basic coating lines.
  - Operates 57 assembly lines.
  - Floor area of 733,000 square feet on a 60-acre property.
  - Built in 1981, started production in 1983.
- Plant 2
  - Electronics manufacturing and assembly for components such as heater controls, amps, and other circuit board surface-mounted electronics.
  - If looked at independently of Plant 1, Plant 2 would be a conditionally exempt small quantity generator of hazardous waste.
  - Area under roof is approximately 15-20,000 square feet.
  - Built after 1980.

#### Process Description – Plant 1:

- Injection Molding (IM)
  - Two types of IM take place at Stanley:
    - Thermal Plastic Molding: Plastic, once set, can be altered with the application of heat. Resins are vacuumed in to the IM lines from silos. The waste and rejects from this process can be recycled.
    - Thermal Set Molding: Plastic, once set, cannot be altered or reformed. These resins come to the facility in boxes and appear to be like a fiberglass putty. These resins are fed into a hopper on the IM machine manually. The parts are molded, but the rejects and excess waste cannot be recycled. Air pollution from the styrenes in the the Thermal Set process are regulated under an Air Permit.
  - Mold release aerosols are used in the IM machines. These cans are punctured on-site and the emptied cans are sent off-site as scrap metal.
- Coatings
  - The coatings processes generate the bulk of the waste at this facility.
  - The coating lines are as follows: one hard coat, two anti-fog, one hard coat with anti-fog combination, four decorative paint, and four reflector extrusion.
  - The coatings are purged from the gun applicators into either a bucket or a 55-gallon drum within the booth or in an attached antechamber.
  - Components that are subjected to decorative coatings are masked. The masking is cleaned off of the painted components in a wash process that uses a non-hazardous surfactant.
  - Jigs, which are the fixtures that hold the components which are coated, are cleaned with a

- sodium hydroxide and sulfuric acid wash.
  - A separate caustic wash system is also used at the Facility.
- Shot blasting is used to clean equipment and is located in the caustic wash room.
- Assembly
  - The individual components created at the plant such as the lamp housing is combined with the electronics and the lamps for shipment.

#### Waste Generation and Management – Plant 1:

- Spent caustic wash is managed as hazardous waste.
- Residues from the decorative paint surfactant baths are non-hazardous.
- Spent paint and solvents are collected in 5-gallon and 55-gallon containers and managed as hazardous waste.
- Rags which are mostly used in the assembly area are sent off-site for laundering.
- Rags which are used in coating areas are collected in 55-gallon drums and managed as hazardous waste.
- Spent shot from the shot blasting unit is reused in the unit. Baghouse dust is sent off-site for recycling.
- Universal waste lamps and batteries are collected. The lamps are crushed on-site with a drum top crushing mechanism. The crushed lamps have been analyzed and are managed as non-hazardous waste. The filters from the crusher are managed as hazardous waste for mercury. If the filters are combined with the lamps, they managed the crushed lamps as hazardous as well.
- Spent oil is collected in 55-gallon drums and totes. All oil is managed as non-hazardous solid waste rather than used oil. Oil in totes is spent hydraulic oil, which is considered by the facility to be relatively clean. It is sent to Capitol Oil and earns Stanley a recycling credit.

#### Process Description – Plant 2

- Automotive electronic systems are created and assembled at this facility.
- The manufacturing takes place in a clean room, which occupies most of the building.
- Components are assembled, soldered, and cleaned.

#### Waste Generation and Management - Plant 2

- Lead waste from soldering at this plant is managed as scrap metal for recycling.
- The wash process involves one water-based system and one isopropanol-based system. The IPA system is managed as hazardous waste when spent.
- Solids generated from the IPA system are managed as hazardous waste as well.
- Aerosol cans are punctured and the residuals are managed as hazardous waste.

### Site Tours

#### Plant 1:

The tour began at the southwest corner of the facility and proceeded gradually north and east through the plant.

Projector Housing room: In this area, a base coat is applied to a molded component and a vacuum metallization process applies an aluminum coat. This process is used in many of the other IM areas in the plant. For each of the two coating lines in this room, a 5-gallon purge bucket in the coating booth was labeled as "Hazardous Waste." These buckets are consolidated in a 55-gallon drum located nearby in a flammable-proof cabinet (See Appendix A: Photograph 1). This cabinet is vented to a regenerative thermal oxidizer (RTO). The drum of UV paint thinner was marked as "Hazardous Waste" and with waste numbers D001, D007, D035, F003, and F005. A second drum also in the cabinet was for UV paint thinner solids and was similarly marked as the first drum. Typically, here and throughout the plant, spent liquids are line purge wastes and the spent solids are rags, filter wastes, and other miscellaneous items that are not liquids.

IM Equipment: I observed two banks of IM machines. Hazardous waste does not appear to be generated from this equipment. Here, and throughout the facility, I observed 55-gallon drums of spent oil labeled as "Non-RCRA Regulated Waste" (See Appendix A: Photograph 2). Mr. Nwamba explained that Stanley does not manage spent oil as used oil. An analysis of the oil was not available for review.

Die-Mold: Dies and molds undergo maintenance in this area. I observed a container of used rags that was intended for laundering. The container was labeled as "Excluded Solvent Contaminated Wipes." In a room adjacent to Die-Mold, was a can-puncturing mechanism attached to a 55-gallon drum. The drum was labeled as "Hazardous Waste" and marked with D001, D035 and D040 waste codes. The D040 waste code represents trichloroethylene, which is used in this room almost exclusively. Also in this room, was a tote of process water that contains trace amounts of molybdenum, which is an element no longer used at the facility. However, any water that comes into contact with equipment which formerly contained molybdenum is considered contaminated. The facility manages that process water separately from all other process waters and is not permitted by the POTW to discharge it until it is deemed free of the element. The material is non-hazardous.

BMC: Stanley operates eight Bulk Molding Compound machines which use the thermal set process. Hazardous waste was not observed by the BMCs.

North Storage area: Only virgin materials appeared to be stored in this area.

Coating Line 3: Hazardous waste storage was located in a room within the line. I observed one 5-gallon container for rags and personal protective equipment (PPE); one 1-gallon container for filter drippage; one 55-gallon drums for rags and PPE; and one 5-gallon bucket of paint/solvent waste. Each of these containers was closed and labeled as "Hazardous Waste" (See Appendix A: Photographs 3 and 4). The small containers of liquid wastes were to be transferred to a 55-gallon drum that had not yet been replaced for the area.

Satellite Accumulation Area #13: A miscellaneous storage room in the coatings area held one 55-gallon drum of absorbent rags contaminated with trichloroethylene (See Appendix A: Photograph 5). I noted to the facility representatives that this container was not in the area where the rags are generated, which is in the Die-Mold room. The drum was labeled as "Hazardous

Waste” and was closed. The drum was not marked with a start date of accumulation and was not intended to be a 90-day storage container.

DP 1: This decorative paint line was located at the north end of the facility by Engineering and Designs. In a cabinet associated with the line, was one 10-gallon container of “Hazardous Waste” solids and one container of “Hazardous Waste” liquid. Also, in this area was a mask washer which uses the non-hazardous detergent.

Satellite Accumulation Area #20: This area is used primarily for storing and mixing coatings. I observed two 55-gallon drums for the solid and liquid coatings wastes which were both marked as “Hazardous Waste” and were closed. The drums were not marked with start dates of accumulation. I asked if the material in these drums was generated within the room. Line purge from coating line 5 was also brought to this area, which is neither at nor near that point of generation. The containers were not managed as 90-day storage containers.

Satellite accumulation area for aerosol cans by the trash compacter truck bay: A 55-gallon drum was fitted with a can-puncturing mechanism. The drum was labeled as “Hazardous Waste” and the container was closed. A 5-gallon bucket of “Used Batteries” for recycling was also in this area.

Caustic Wash: The wash line consists of a series of baths containing sodium hydroxide, sulfuric acid, and a rinse tank, respectively. A 55-gallon drum of caustic wash spill collection was in the room. This drum was marked as “Hazardous Waste.” The rinse water tank is emptied out into totes and is managed as hazardous waste. A mask wash unit is also in this room which generates a non-hazardous waste.

Mechanical Room: This room is used to store universal waste and the lamp crusher (See Appendix A: Photograph 6). One cylinder of 4-foot lamps was marked as “Universal Waste” and marked with a start date of 8-5-16. Because these lamps are crushed, however, they are not being recycled as is required of a universal waste. It was unknown at the time of the inspection if the lamps themselves would be considered hazardous wastes. The filter on the lamp crusher is managed as hazardous waste for its concentrated mercury content. A 1-gallon bucket for the filters in the area was labeled as “Hazardous Waste” and was closed. The crushed lamps are managed as non-hazardous.

Electronics: Circuit board components are soldered in automated units in this area. Waste lead is accumulated for recycling as a scrap metal. Waste circuit boards are also accumulated for recycling.

Coating Lines 1 and 2: Both coaters apply a base coat and metallization. Within Line 2, the satellite accumulation room held one 55-gallon drum of “Hazardous Waste” liquids, one 18-gallon drums of “Hazardous Waste” rags/solids, and one 1-gallon container of “Hazardous Waste” filter dribble.

UV/Hard Coat Line: Only one 5-gallon bucket of “Hazardous Waste” was in the satellite accumulation booth in this line. A 55-gallon drum had not yet been brought in as a replacement.

Anti-Fog Lines 1 and 2: Both lines are identical. In the satellite booths for both lines were one 5-gallon bucket for "Hazardous Waste" solids and one 5-gallon bucket for "Hazardous Waste" filter bleed-off.

Hard Coat / Anti-fog Line: One 5-gallon bucket of waste was in the satellite booth for this line. This bucket was not labeled.

Line 5: The components are washed prior to base coat and metallization applications. One 5-gallon bucket of waste was in the satellite booth associated with this line. The bucket was not labeled. The waste from this line is taken through the facility to SAA #20, as noted above.

DP 3: South of Line 5 is the decorative paint line 3. I observed one 55-gallon drum of "Hazardous Waste" liquids, one 5-gallon bucket for "Hazardous Waste" solids, and two 5-gallon buckets for "Hazardous Waste" filter air purge waste. I observed a mask washer near this area, as well as a jig wash, north of DP 3. Hazardous waste is generated from the jig wash, however, waste was not observed at the time of the inspection.

90-day storage area: Eighteen 55-gallon drums and two totes were in storage. The earliest date noted on these containers was from 8/12/16. Each container was closed and marked as "Hazardous Waste." Aisle space appeared adequate. The following non-hazardous wastes were also stored in this area: Process cooling water (three containers), Stencil wash water (two containers) and Decorative Paint wash water (one container). A drum of used oil filters was marked as "Non-Regulated." A containers of Lithium ion batteries was marked as "Non-RCRA Regulated." The container was not marked as universal waste. A tote of batteries was also not labeled as "Universal Waste" (See Appendix A: Photograph 7). The tote was marked prior to my departure from the facility. At this time, Mr. Nwamba noted that drums are reused for hazardous wastes, and it is their protocol to check for incompatibilities before placing a material in a container that previously held a different chemical. MIBK and IPA are typically managed in the same container.

Lead Solder Waste Storage Area: I observed a pallet of the lead solder that is generated from the soldering activities in the electronics department. The containers are not labeled, they are managed as scrap.

Satellite Accumulation Area #21: I did not observe this area; however, I was told that hazardous materials and oil that is accumulated for credit is stored in that area. I was unable to ascertain if the oil collected for credit was managed as a used oil.

Tail-light and Direct Metallization Injection Molding: I did not observe any hazardous waste in this bank of IM equipment.

QA Test Laboratory: Wet chemistry is not conducted in this laboratory. If rags are used, they are contaminated with IPA or heptane only and are dry when discarded.

End of Plant 1 Site Tour.

## Plant 2:

This tour was limited in scope. I chose not to go through the air showers to gown up and enter the clean room. I observed the soldering, assembly, and cleaning operations from the outside of that area. The waste containers were stored outside of the room.

I observed a 55-gallon drum for aerosol can residue. The drum was marked as “Hazardous Waste” and the puncturing mechanism on the drum was closed. Next to this drum, was one 5-gallon bucket of “Universal Waste – Batteries.” This container was also closed.

In a flammable-proof cabinet in a maintenance area, I observed two 55-gallon drums of wastes that were generated in the clean room (See Appendix A: Photographs 11 and 12). This cabinet was approximately 75 – 100 feet from the clean room and was in the general open area accessible by all employees in the plant. The drums were closed and labeled as “Hazardous Waste.” The first drum held “Solids Containing Liquids.” The second drum held liquids only. The containers were not marked with start dates of accumulation. The Stanley representatives stated that these containers take much longer than 90 days to fill.

End of Plant 2 site tour.

## **Records and Emergency Preparedness Review**

Preparedness and Prevention: The Facility is equipped with internal communications and alarm systems. Phones are available for external communications to summon emergency assistance. In addition to a plant-wide fire suppression system, portable fire extinguishers and spill control equipment are located throughout the Facility and near the designated 90-day hazardous waste storage area. Emergency equipment is tested and maintained according to a schedule. Aisle space appeared to be adequate throughout the facility. Arrangements with local emergency authorities have been made.

Contingency Plan: The contingency plan is part of Stanley’s Environmental Policy and as last updated in January, 2015. One of the emergency coordinators has left the facility and was replaced by Mr. Nwamba, whose information is not yet included in the plan. The plan otherwise includes emergency coordination agreements with responders including a spill contractor, a list of emergency equipment with descriptions, capabilities, and locations; a plan distribution list; and, evacuation procedure.

Manifests: Three years of hazardous waste manifests were available for review. Of note, the paint waste management method code was H061. A waste code for the paint wastes include D007 for chromium. Land disposal restriction (LDR) forms were also available for review. The LDRs appeared to include all requisite information.

Training: Training records for all employees at the facility were available for review. Training includes information regarding the 90-day area, preparations for shipping, and facility emergencies. Advanced training is offered for in-house emergency responders. This training is provided on a three month cycle. Mr. Nwamba received HazWOper training and

Hazardous Waste Management training in June, 2015. The other two emergency coordinators have received general RCRA training. Employees who sign manifests took on-line training while I was at the facility on August 18, 2016 to supplement the annual general training. A computerized training system alerts the employee when training is due.

Inspections: Inspections were being conducted consistently in the designated 90-day hazardous waste storage area. Inspections are also conducted at the satellite areas. The documentation for the inspections includes the failures that were observed and the corrective actions used to correct errors.

Waste Determinations: Documentation supporting waste determinations were available for review. The profile for non-regulated oily water includes tool wash water, final rinse wash water from the mask washer in the caustic room, decorative paint wash water, process cooling water from injection molding, and stencil wash water from Plant 2. They also have profiles for each of these waste waters independently. Other profiles that reviewed were for decorative paint solids, metallizer non-contact cooling water, carbon adsorbent from the oil water separator, paint waste from base coat or hard coating line flush, and citric acid Nalco 8344.

Profiles for wastes specific to Plant 2 included isopropanol parts washer waste; contaminated debris, toluene waste, and stencil wash water (no longer generated).

Used oil is managed at both plants as a non-hazardous solid waste. A profile for this waste was not available for review.

### **Closing Conference**

The following items were discussed with Stanley personnel at the close of the inspection:

- Confidential Business Information (CBI) – It was determined that I did not collect information or photographs that were to be managed as CBI.
- Satellite accumulation requirements;
- Used oil management;
- Lithium ion battery management;
- Weekly inspections consistency;
- Contingency plan updates;
- Training program

### **List of Appendices**

- Appendix A: Photograph Log
- Appendix B: Checklists
- Appendix C: Documents Received During the Inspection





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# Appendix A

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## Photograph Log

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**Inspection Date:**

August 17-18, 2016

**Facility Name and ID Number:**

Stanley Electric U.S. Co., Inc.

EPA ID: OHD034909358

**Inspector and Photographer:**

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

**Camera Used:**

Olympus Stylus 600

Serial Number: A47525904

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## Photograph 1

Taken at 9:59 a.m. CT on 8/17/16

In the Projector Housing room, spent line flush and used rags are stored in 55-gallon drums. These containers were both closed and labeled.



## Photograph 2

Taken at 10:06 a.m. CT on 8/17/16

Spent oil is managed as a "Non-RCRA Regulated Waste."



### Photograph 3

Taken at 10:40 a.m. CT on 8/17/16

Satellite containers of hazardous waste were stored in a room within Coating Line 3. Each container was closed and labeled.



### Photograph 4

Taken at 10:40 a.m. CT on 8/17/16

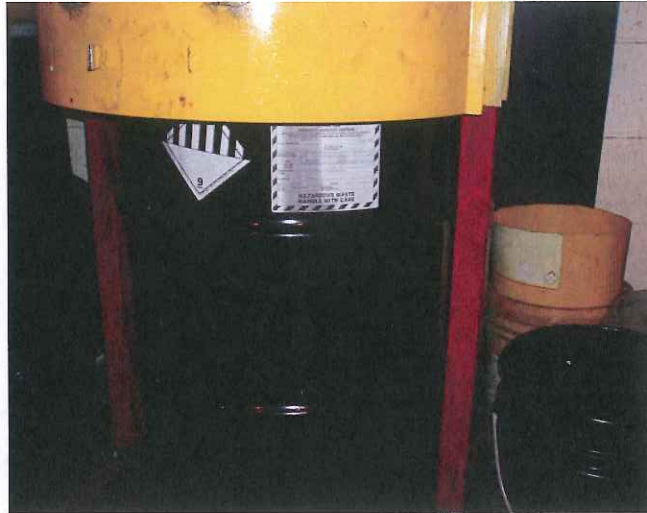
See description for Photograph 3.



### Photograph 5

Taken at 10:53 a.m. CT on 8/17/16

Rags contaminated with trichloroethylene were stored in a 55-gallon drum in satellite accumulation area #13. These rags are not generated in this area. The drums was not marked with a start date of accumulation, but was labeled as "Hazardous Waste" and was closed.



### Photograph 6

Taken at 11:23 a.m. CT on 8/17/16

A lamp crusher was located in the Mechanical Room. The 55-gallon drum beneath the crusher was marked as Non-RCRA regulated waste. A fiber-board cylinder for lamps was staged next to the drum. The container was labeled as "Universal Waste." The 2-gallon bucket on the floor is for used filters, which are hazardous for mercury content. The bucket was labeled as "Hazardous Waste" and was closed.





## Photograph 7

Taken at 1:37 a.m. CT on 8/17/16

In the 90-day storage room, one fiberboard container of lithium ion batteries was marked as "Non-RCRA Regulated Waste." I noted to Mr. Nwambe that these batteries may be RCRA hazardous for reactivity. He provided a copy of the waste profile.

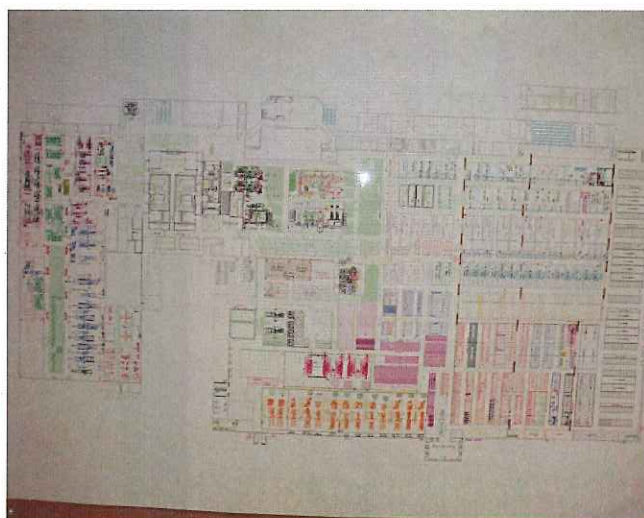
The gray tote of batteries next to the fiberboard drum was not labeled as "Universal Waste." A label was added prior to my departure from the facility.



## Photograph 8

Taken at 9:56 a.m. CT on 8/18/16

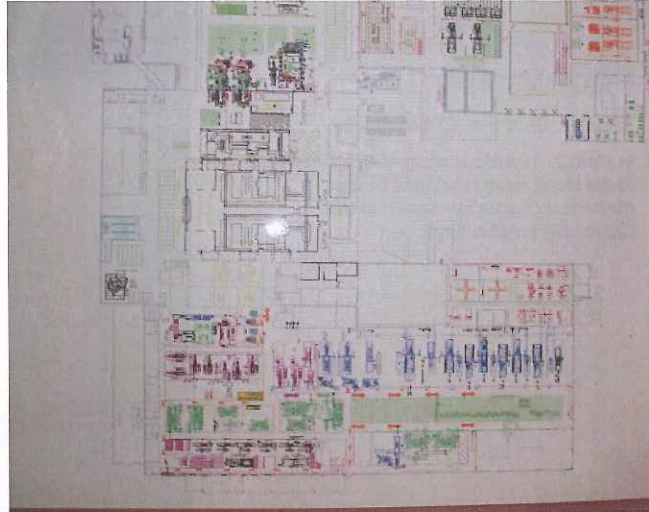
Overview of a schematic of Plant 1.



## Photograph 9

Taken at 9:57 a.m. CT on 8/18/16

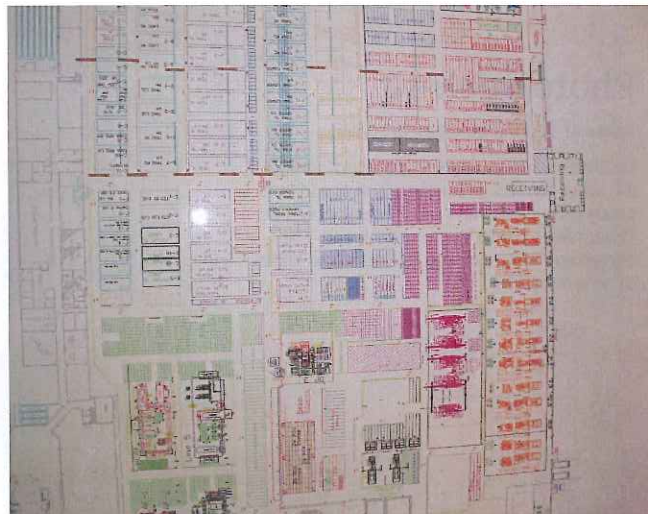
Close-up of the western half of the schematic identified in Photograph 8.



## Photograph 10

Taken at 9:58 a.m. CT on 8/18/16

Close-up of the eastern half of the schematic identified in Photograph 8.



### Photograph 11

Taken at 10:39 a.m. CT on 8/18/16

In Plant 2, hazardous waste that is generated in the clean room is brought to the maintenance area for storage in this flammable proof cabinet.



### Photograph 12

Taken at 10:40 a.m. CT on 8/18/16

Inside the cabinet identified in Photograph 11, were two 55-gallon drums of hazardous waste. The containers were both labeled as "Hazardous Waste" and were closed. The containers were not marked with start dates of accumulation.





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# Appendix B

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## Checklists

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**Inspection Date:**

August 17-18, 2016

**Facility Name and ID Number:**

Stanley Electric U.S. Co., Inc.

EPA ID: OHD034909538

**Inspector:**

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

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STANLEY ELECTRIC - 420 and 480 East High Street

LARGE QUANTITY GENERATOR REQUIREMENTS			
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY			
CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.			
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.			
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.			
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.			
Safety Equipment Used:			
GENERAL REQUIREMENTS			
1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
4.	Were biennial reports filed with Ohio EPA on or before March 1 <sup>st</sup> ? [3745-52-41(A)] (filed on even years for previous year)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
5.	Are biennial reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.			
9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).			
10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]		
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	

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d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Complete appropriate checklist for each unit.		
NOTE: If waste is treated to meet LDRs, use LDR checklist.		
11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
MANIFEST REQUIREMENTS		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue, did the generator:	
a.	Sign item 20 of the new manifest or item 18c of the original manifest?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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	[3745-52-23(F)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
<p><b>NOTE:</b> A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for &lt;90 days or &lt;180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]</p> <p><b>NOTE:</b> Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.</p>		
<b>PERSONNEL TRAINING</b>		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><b>NOTE:</b> For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]</p>		
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

25.	Does the generator provide refresher training to employees during each period from January 1 <sup>st</sup> to December 31 <sup>st</sup> and does each training occur within 15 months after the previous training? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:	
	a. Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (D)(1) of this rule? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><b>NOTE:</b> The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.</p>		
	Job Performed	Date Trained
<b>CONTINGENCY PLAN</b>		
28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
	a. Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	b. Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	c. A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
	d. A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

include new 16001 requirement and new emergency coord.

e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]</i></p>		
30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.</i></p>		
<b>EMERGENCY PROCEDURES</b>		
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><i>NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.</i></p>		

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<b>PREPAREDNESS AND PREVENTION</b>		
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<p><i>NOTE: Verify that the equipment is listed in the contingency plan. YES</i></p>		
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg, phone, and hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>SATELLITE ACCUMULATION AREA REQUIREMENTS</b>		
43.	Does the generator ensure that satellite accumulation area(s):	
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

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b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

#### USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste"? [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
46.	The date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:	
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <i>pallets</i>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.		
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]		
<b>PRE-TRANSPORT REQUIREMENTS</b> <i>in 90 Day Area</i>		
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

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GENERATOR LDR CHECKLIST DOES NOT APPLY TO CESQGS		
<b>GENERAL REQUIREMENTS</b>		
1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: This is done by determining if the HW/soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).		
3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
FOR EXAMPLE: F006 that exhibits the characteristic for silver or K052 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.		
6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains > 10% TOC) D001 wastes or listed HWs.		
NOTE: Written documentation of this determination is not required.		
7.	Did the generator treat his HW/soil on-site to meet the LDR treatment standard?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
NOTE: If "Yes" see question #16.		
8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
i.	Applicable HW codes?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
ii.	Manifest number of the first shipment to the TSD?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
iii.	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTIFICATION FORM</b>		
11.	Does the LDR Notification form contain the following information:	
a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A wastewater contains <1% by wt. total suspended solids(TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.		
e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories		
f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.		
g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.		
<b>PROHIBITED DILUTION</b>		
12.	Is the HW treated by burning?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
If "No" go to #15.		
13.	Is the HW a metal-bearing HW?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs are given in the Appendix to 3745-270-03.		
14.	a. Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless one of the following conditions apply. [3745-270-03(c)]	
i.	Contains > 1% TOC?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

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	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.		Was the HW treated by wastewater treatment?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If "Yes", HW is improperly being treated by dilution.			
	b.	Does the waste carry the D001 code and contain ≥10% TOC?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3).			
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.			
<b>GENERATOR TREATMENT</b>			
16.		Does the generator treat to meet LDRs on-site?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
		Did the generator treat his hazardous waste/soil on-site in a tank, container, drip pad or containment building to meet the LDR treatment standard?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
		If "Yes"...complete the rest of the checklist. If "No"...stop...you are done.	
	a.	Does the generator have a written waste analysis plan (WAP) that describes the procedures he will follow to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	Did the generator use a detailed chemical and physical analysis of the HW/soil in order to develop the WAP? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: This is a laboratory analysis but it does not have to be kept by the generator.			
	c.	Does the WAP contain all information necessary to treat the HW/soil to the LDR treatment standard? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d.	Does the WAP include the testing frequency of the treated HW/soil to demonstrate that the LDR treatment standard is being met? [3745-270-07(A)(5)(a)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	e.	Does the generator keep the WAP on-site? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	f.	Is the WAP available for the inspector's review during the inspection? [3745-270-07(A)(5)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>NOTIFICATION FORM FOR GENERATOR TREATMENT</b>			
17.	a.	Contains all information in #11 a-g above and	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

	b.	If the treated HW/soil is listed.....notification contains the following certification statement:  "I certify under penalty of law that I personally have examined and am familiar with the waste, through analysis and testing or through knowledge of the waste, to support this certification that the waste complies with the treatment standards specified in rule 3745-270-40 to 3745-270-49 of the Administrative Code. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment."	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c.	If the treated HW/soil no longer exhibits a characteristic and is no longer a HW, did the generator:	
	i.	Prepare a one-time notification? [3745-270-09 (D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Maintain a copy of the notice onsite? [3745-270-09(D)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	Include in the notification: [3745-270-09(D)]	
	1.	Name & address of receiving landfill?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	2.	Description of HW when generated?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	3.	HW code when generated?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	4.	Treatability group when generated?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	5.	Underlying hazardous constituents present when generated?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	Contain the certification statement as required by 3745-270-07(B)(4)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>



SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS			
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more			
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less			
PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste-Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE PESTICIDES			
8.	Does the SQUWH prevent releases to the environment by managing pesticides in containers that are closed, structurally sound, compatible with the pesticides, and lack evidence of leakage, spillage, or damage? [3745-273-13(B)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
9.	If the original pesticide container is in poor condition, was it over-packed into an acceptable container? [3745-273-13(B)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
10.	If the pesticide is stored in a tank, are the requirements of rules 3745-66-90 through 3745-66-101, except for paragraph (C) of 3745-66-97, of the OAC met? (Use tank checklist) [3745-273-13(B)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
11.	If pesticides are stored in a transport vehicle, is it closed, structurally sound, compatible with the pesticide(s), and does it lack evidence of leakage, spillage, or damage that could cause leakage? [3745-273-13(B)(4)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	Are recalled universal waste pesticides that are in containers, tanks, or transport vehicles labeled with the label that was on or accompanied the product as sold or distributed and labeled with the words "Universal Waste Pesticides" or "Waste Pesticides"? [3745-273-14(B)(1)&(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>

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13.	Are unused pesticide products that are in containers, tanks, or transport vehicles labeled with either the label that was on the product when purchased (if still legible), the appropriate DOT label, or the designated label prescribed by the pesticide collection program and labeled with the words "Universal Waste-Pesticides" or "Waste Pesticides"? [3745-273-14(C)(1)&(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
UNIVERSAL WASTE MERCURY-CONTAINING EQUIPMENT				
14.	Has mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage or damage that could cause leaks been placed in a container that is closed, structurally sound, compatible with contents of the device and lacks evidence of leakage, spillage or damage that could cause leakage and is designed to prevent escape of mercury into the environment by volatilization or any other means? [3745-273-13(C)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	If the mercury-containing ampules are removed, does the SQUWH: [3745-273-13(C)(2)]			
a.	Remove and manage the ampules in a manner to prevent breakage and is the removal done over or in a containment device? [3745-273-13(C)(2)(a)&(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Have a clean-up system readily available to transfer spilled mercury to another container that meets the requirements of OAC rule 3745-52-34 and is the spilled mercury transferred immediately? [3745-273-13(C)(2)(c)&(d)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Ensure that the area where ampules are removed is well ventilated and monitored in compliance with applicable OSHA exposure levels for mercury? [3745-273-13(C)(2)(e)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
d.	Ensure that employees are thoroughly familiar with the proper waste handling and emergency procedures? [3745-273-13(C)(2)(f)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
e.	Ensure that removed ampules are stored in closed, non-leaking containers that are in good condition? [3745-273-13(C)(2)(g)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
f.	Pack removed ampules in containers with packing material to prevent breakage during storage, handling and transportation? [3745-273-13(C)(2)(h)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
16.	If the open original housing holding mercury is removed from a mercury-containing equipment that does not contain an ampule, does the SQUWH: [3745-273-13(C)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
a.	Immediately seal the original housing holding the mercury with an air-tight seal to prevent the release of any mercury to the environment? [3745-273-13(C)(3)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Follow all requirements for removing ampules and managing removed ampules in accordance with 3745-273-13(C)(2)? [3745-273-13(C)(3)(b)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
17.	When removing mercury containing ampules from mercury-containing equipment or sealing mercury from its original housing if there are mercury or clean-up residues resulting from spills or leaks, and/or other waste generated (e.g., remaining mercury-containing device), has it been determined whether those exhibit a characteristic of hazardous waste identified in OAC rules 3745-51-20 to 3745-51-24? [3745-273-13(C)(4)(a)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

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a.	If the residues, and/or wastes are characteristic, are they managed in compliance with Chapters 3745-50 through 3745-69, 3745-205, 3745-256, 3745-266, and 3745-270 of the Administrative Code? (The handler is considered the generator of the mercury, residues, and/or other waste and is subject to OAC Chapter 3745-52) [3745-273-13(C)(4)(b)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
18.	Is mercury-containing equipment or containers of mercury-containing equipment labelled either "Universal Waste-Mercury-Containing Equipment" or "Waste Mercury-Containing Equipment" or "Used Mercury-Containing Equipment"? [3745-237-14(D)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
19.	Are mercury-containing thermostats or containers containing ONLY thermostats labeled either "Universal Waste-Mercury Thermostat(s)" or "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)"? [3745-273-14(D)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>UNIVERSAL WASTE LAMPS</b>		
20.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <i>But not hazardous</i>
21.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><b>NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.</b></p>		
22.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>ACCUMULATION TIME</b>		
23.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
<p><b>NOTE: Accumulation is defined as date generated or date received from another handler.</b></p>		
24.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
If yes, describe below:		

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<b>EMPLOYEE TRAINING</b>		
25.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>RESPONSE TO RELEASES</b>		
26.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
27.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
28.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>OFF-SITE SHIPMENTS</b>		
<b>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</b>		
29.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
30.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
32.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
33.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do one of the following:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>
34.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<b>EXPORTS</b>		
<p><b>NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]</b></p>		
<p><b>NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.</b></p>		

Facility Name/Inspection Date  
[ID Number]  
RCRA Small Quantity Universal Waste Handler Inspection Checklist April 2014 revision  
Page 4 of 4

USED OIL INSPECTION CHECKLIST GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS		
<p><b>NOTE:</b> 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.</p> <p>2. Inspectors can check BUSTR's web-site at <a href="https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp">https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp</a> to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: <a href="https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp">https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp</a>.</p>		
<b>PROHIBITIONS</b>		
1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTE:</b> For example, used oil contaminated scrap metal stored in a pile.		
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTE:</b> Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).		
<b>GENERATOR STANDARDS</b>		
4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTE:</b> Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, <u>unless</u> the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.		
5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTE:</b> If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.		
6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil"? [3745-279-22(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

Not  
Applicable

9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>ON-SITE BURNING IN SPACE HEATER</b>		
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTE:</b> Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).		
<b>GENERATOR TRANSPORTATION</b>		
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]	
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTE:</b> Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).		
<b>COLLECTION CENTERS AND AGGREGATION POINTS</b>		
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
<b>NOTE:</b> Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.		

Stanley manages all used oil as non-RCEA regulated non-hazardous waste. They have agreed to provide additional documentation to support non-hazardous determination.



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# Appendix C

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## Documents received during the Inspection:

- Plant 1 Site Map.
- Map of hazardous and non-hazardous waste storage areas for Plant 1.
- Hazardous waste table from the Stanley contingency plan.
- Stanley Program Summaries.
- RCRA Subtitle C Site Identification form 9029 for Plant 2 (includes cover sheet).
- Email from OEPA regarding Plant 2 EPA ID number.
- OEPA "No Exposure Certification for Exclusion from NPDES Storm Water Permitting" record.
- Weekly inspection example record.
- LDR example record.

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### **Inspection Date:**

September 17-18, 2016

### **Facility Name and ID Number:**

Stanley Electric U.S. Co., Inc.

EPA ID Number: OHD034909358

### **Inspector:**

Brenda Whitney

Compliance Section 2

RCRA Branch

Land and Chemicals Division

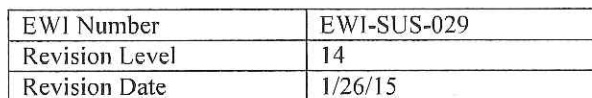
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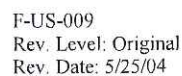








**TITLE: HAZARDOUS AND NON-HAZARDOUS WASTE MAIN FACILITY**

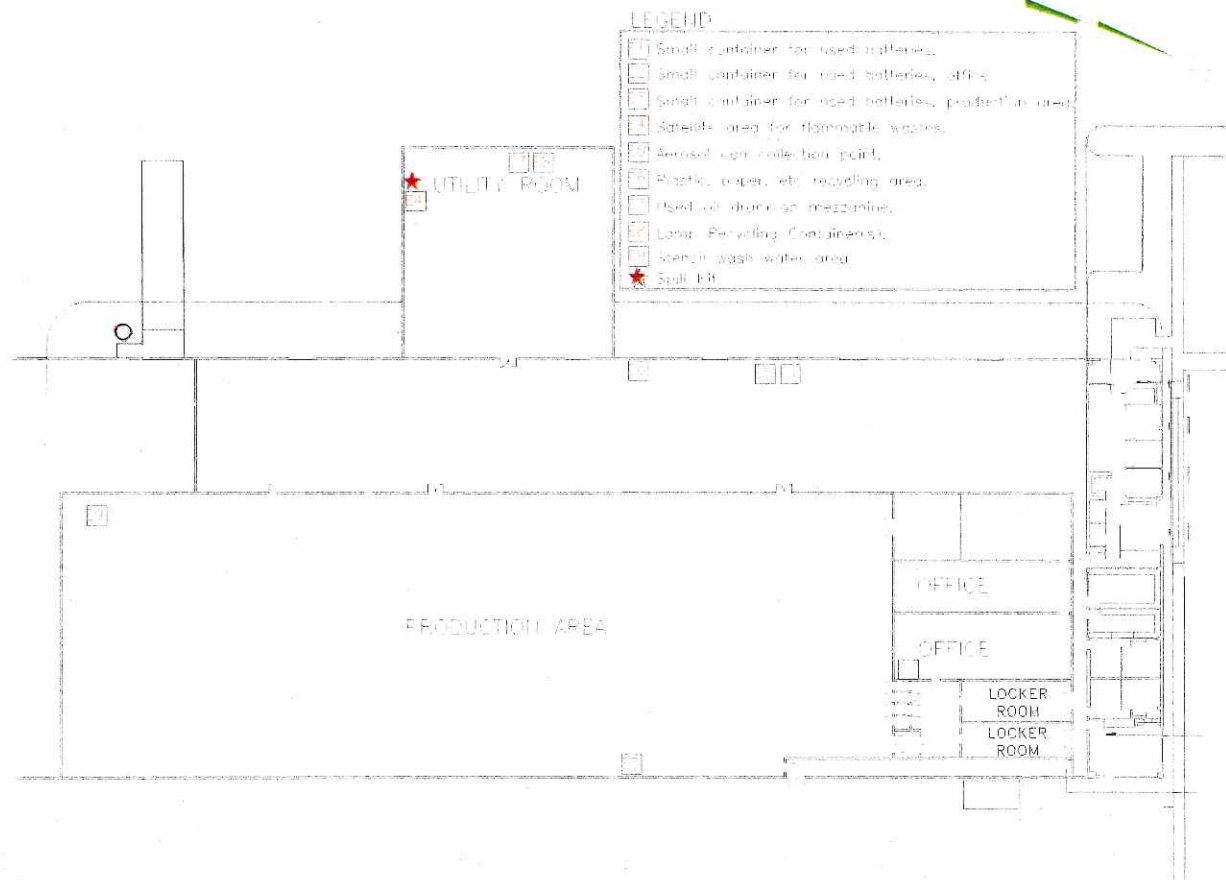




EWI Number	EWI-SUS-029
Revision Level	14
Revision Date	1/26/15

## ENVIRONMENTAL SYSTEM WORK INSTRUCTION

**TITLE: HAZARDOUS AND NON-HAZARDOUS WASTE EL2**





Number	HWCP
Revision Level	7
Revision Date	1/26/2015

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**TITLE: HAZARDOUS WASTE CONTINGENCY PLAN**

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Exhibit 1  
Stanley Electric US Co. Inc.  
Contingency Plan  
Hazardous Waste Table

Waste Description	Waste Codes	Generating Department
Waste paint and solvents	D001, D035, F003, F005 D007	MFGIII
Waste wipes contaminated with heptane	D001	MFG I and MFGII
Waste filters contaminated w/ paint & solvents	D001, D035, F003, F005 D007	MFGIII
Rags contaminated with Trichloroethylene (TCE)	D040, F001	MFGIV
Waste caustic tank sludge	D002, D007	MFGIII
Off spec raw materials and chemicals	VARIOUS	VARIOUS
Waste from aerosol cans	D001, D035, D040	DIEMOLD
Oil contaminated with TCE	D040, F001	MFGIV
Hazardous waste fluorescent lamps from crushing	D009	FE
Waste 3D printer support Cleaner	D002	Design
Waste aerosol cans for disposal	D00, D035, D040	VARIOUS/EL2
Waste IPA and Toluene	D001, D007, D011, F005	EL2
Waste debris contaminated with Toluene	D008, D011, F005	EL2
Other Regulated Wastes:		
Used oil in 55-gallon steel drums		VARIOUS
Universal Wastes - Batteries in closed 55-gallon drum		VARIOUS
Universal Waste – Fluorescent Lamps in recycling containers		VARIOUS
Universal Waste – Mercury from Thermostats		FE
Universal Waste – Mercury Contacts		MFGIV





## Program Summaries

Stanley Electric U.S. CO., INC. (SUS) (which includes the EL2 plant located at 480 E. High Street) is dedicated to the manufacture of automotive lighting systems. Operations associated with these products, which could potentially impact the environment, include Paint Booths, Ovens, Solvents, Water Discharges, Caustic Soda, Sanitary Sewer, Resins, and Glycol Tanks. This section briefly describes each of the environmental areas at the facility.

### Air

Stanley Electric U.S. CO., INC. has air emissions in the form of NO<sub>x</sub>, SO<sub>2</sub>, CO, Organic Compounds (OC), Hazardous Air Pollutants (HAPs), and Particulate Matter. A Title V Permit No. P0083767 covers the main facility and EL2 facility with an issue date of September 12, 2011 and an effective date of October 3, 2011 with an expiration date of October 3, 2016. The Facility ID Number is 01-49-00-0089. This permit was issued by the Ohio Environmental Protection Agency (OEPA) and covers 11 surface coating operations and 6 5 compression/injection molding machines. BMC Molder R043 will replace R037 but is permitted separately. Each emission unit (emissions source) at the facility must comply with all applicable State and Federal Regulations as well as any emission limitations, terms and conditions and / or control requirements listed in the Title V permit. Testing for the control devices (incinerators) must be completed within 6 months of permit issuance and within 18 months of permit expiration. The Environmental Coordinator maintains a copy and submits renewal applications for this permit.

This permit covers the following emission units:

OEPA ID	Description
• R003	Smoke Topcoat
• R022	UV Line 1
• R023	UV Line 2 (AKA DP2 Line)
• R024	UV Hardcoat
• R025	UV Line 3
• R027	Decorative Paint Line 1
• R028	UV Line 4
• R029	Antifog Line 1
• R030	Antifog Line 2
• R032	BMC Closed Molding Machine # One (1)
• R033	BMC Closed Molding Machine # Ten (10)
• R036	BMC Closed Molding Machine # Four (4)
• <del>R037</del>	<del>BMC Closed Molding Machine # Five (5)</del> <u>REMOVED 07/11/2011</u>
• R038	BMC Closed Molding Machine # Thirty-six (36)
• R039	BMC Closed Molding Machine # Forty-one (41)
• R040	BMC Closed Molding Machine #Forty-seven (47)
• R041	Hardcoat/ AF line
• R042	UV Line 5
• R043	BMC Closed Molding Machine #10299 NEW Installed 09/05/2011
• R044	DP Line 3 PTI issued 08/2012
• R045	PES line 1, PTI issued 7/3/2014
• R046	PES line 2, PTI issued 7/3/2014
•	Misc Natural Gas Fired Sources
•	Misc DeMinimus Sources, including EL2's heater control circuit board manufacture.
•	Misc Equipment containing CFC's/HCFC's
•	Exempt parts cleaners at EL2 plant



A Title V permit renewal application must be submitted between 18 months and 6 months prior to the expiration date. SUS is covered by the current permit once a renewal application is received and judged to be complete by the OEPA until a new Title V Permit is issued.

Sources R001, R004, R006, R007, R009, R010, and R012 have been removed from the plant and replaced with Sources R022, R023, R025, and R027. Sources R018, R019, R020, and R021 have been removed from the plant and replaced with Source R024. A letter has been sent to OEPA notifying them that these 11 sources have been removed from the plant. Closed Molding Machines, R034, R035, and R037 were removed from the plant. The Lab Spray Booth, R031, was removed from the plant. Sources R047 and R048 for the PES production lines were permitted for in 2014, however they were never installed.

Stanley Electric U.S. CO., INC. is required to submit an annual compliance, semiannual compliance, semiannual MACT compliance and quarterly written reports of any deviations from required emission limitations, operational restrictions, and control device-operating parameter. If no deviations have occurred during the quarter, a written report must be submitted which states that no deviation occurred.

Stanley Electric U.S. CO., INC. is also required to submit an annual Fee Emissions Report (Air Services through OEPA Ebusiness website) which includes total Hazardous Air Pollutant, organic compound emissions and total gallons of cleanup materials used during the year of each emission unit. SUS is required to maintain records as required in the Title V permit in order to demonstrate compliance with Title V Permit Conditions. For the complete list of requirements for each emission unit, see the Environmental Coordinator who maintains a copy of the Title V Air Permit.

Stanley Electric U.S. CO., INC. has several water fountains that contain less than 50 pounds of regulated refrigerants (CFCs or HCFCs). Stanley Electric operates several "Polycold" units in MFG III and MFG IV that contain fluorocarbon materials. SUS operates seven chiller units that contain approximately 155 pounds each of refrigerant. Three of these chillers contain non-regulated refrigerant R-134A and four of these units contain regulated refrigerant R-22. Because these chiller units contain greater than 50 pounds of CFCs, they are subject to 40 CFR Part 82 Control of Stratospheric ozone promulgated under CAA Section 608 National Recycling and Emission Reduction Program. Leaks from the chiller units must be repaired within 30 days of discovery if the unit leaks at a rate that would release 15% or more charge over a year. All servicing is performed by outside contractors. Service records for the chiller units must be maintained onsite in the appropriate file in the Facility Engineering office.

Stanley Electric U.S. CO., INC. holds a certificate of operation for two natural gas fired boilers from the Ohio Division of Industrial Compliance, Bureau of Operations and Maintenance. Boilers are regulated under Chapter 4104 of the Ohio Revised Code and Chapter 4104:4 of the Ohio Administrative Code. A licensed inspector must inspect each boiler annually. Inspection records for the boilers must be maintained onsite in the appropriate file in the Facility Engineering office. (Note: Boiler #3 has been disconnected from the gas and water lines and is not operational but still located in the plant.)

### MACT Standard

Stanley Electric US Co Inc. subject to two (2) Federal Maximum Achievable Control MACT Standards.

The first is PPPP. This MACT Standard regulates the Hazardous Air Pollutant (HAP) emissions from the coating lines.

The second is WWWW. This MACT Standard regulates the Hazardous Air Pollutant (HAP) emissions from the BMC molding machines as a result of the thermoset resin curing process and the chemical, Styrene, contained within the BMC materials.



## Stormwater

Storm water sources at the main Stanley Electric U.S. CO., INC. facility include parking lots and roof drains. The storm water collects and is directed through a retention pond and ultimately discharges to a tributary of Deer Creek. This main facility holds an NPDES General Permit Number OHR 000004 under Facility ID Number 4GR00005\*BG, for storm water discharge from the Ohio Environmental Protection Agency. The facility filed a Notice of Intent (NOI) in April 2011 to renew this Stormwater permit. The permit was issued December 15, 2011 and remains in effect until December 31, 2016. The EL2 facility location at 480 E. High Street does not require a stormwater permit and a no exposure certification was sent to OEPA. A receipt for the no exposure certification was received November 13, 2013.

As a requirement of the Storm Water General Permit, the main facility is required to have a Storm Water Pollution Prevention Plan (SWP3). The SWP3 must be signed by a responsible corporate officer, or duly authorized representative of the company. The SWPP Plan (SWP3) was prepared in May 2009 and is maintained by the Senior Environmental Engineer. The SWP3 is combined with the SPCC plan into a Release Prevention Control and Countermeasures plan (See Oil and Petroleum Section on page 9).

The SWP3 must be amended whenever there is a change in design, construction, operation, or maintenance, which has a significant effect on the potential for the discharge of pollutants to the waters of the state. A comprehensive site inspection is scheduled annually. The SWP3 plan shall include at a minimum the following items:

- Designation of a Storm Water Pollution Prevention Team
- Description of potential pollutant source (site draining maps, inventory of potentially exposed materials, a list of past spills and leaks, sampling data, risk identification and summary of potential pollutant sources).
- Storm Water Management Measures and Controls (Preventive Maintenance, Spill Prevention and Response Procedures, Inspections, Employee Training, Record keeping and Internal Reporting Procedures, Sediment and Erosion Control and Management of Runoff).
- Quarterly stormwater visual assessment.
- Quarterly site inspection and Annual Comprehensive Site Inspection (Visual Inspection of Material Handling and other potential sources of pollution and signed inspection report — F-SUS-068 (Annual Stormwater Evaluation Report)).

Stanley Electric U.S. CO., INC. utilizes Section 313 water priority chemicals but, these materials are only contained within the facility and not exposed to rain or snow.

For details of SWP3 plan requirements and additional requirements for Section 313 water priority chemicals, see the "NPDES General Permit".

## Waste Water - 07-London-007B

The City of London issued the Wastewater Permit number 07-London-007B to Stanley Electric US's main facility that was commenced on July 1, 2011 and effective until December 31, 2014. As of November 21, 2014, OEPA has not issued a new City of London NPDES permit, therefore the City of London cannot issue a new permit for Stanley Electric. The City of London will extend the current permit approx. 6 months. The permit includes biannual monitoring and reporting for various metals and other pollutants including a low -level mercury sampling and testing requirement. Wastewater from Stanley Electric U.S. CO., INC. contains sanitary and process wastewater discharged directly to the City of London sewer system. Process, contact, or non-





contact cooling waters are discharged from SUS.

A wastewater questionnaire was submitted to the City of London for discharges from the EL2 plant located at 480 E. High Street. No process wastewaters are currently being discharged from this plant. Therefore a City of London wastewater permit will not be required at this time.

### Hazardous Waste – OHD034909358

Stanley Electric U.S. CO., INC. is a large quantity generator (LQG) of hazardous waste. Specifically, waste paint, waste paint solvents, and wastes which contain certain metals. The EL2 plant located at 480 E. Main Street was added to the RCRA Subtitle C Site Identification form. Due to the fact that the EL2 plant is located on a contiguous site, the EL2 plant will use the same USEPA ID number as the main facility. A RCRA Contingency Plan and a Hazardous Waste Minimization Plan is required and maintained, a Biennial Waste Report is submitted to the State of Ohio, and hazardous waste manifests must be completed, signed and a copy retained for each shipment of hazardous waste sent from SUS. Stanley Electric U.S. CO., INC. is required to apply for an U.S. EPA Identification number under OAC 3745-52-12 because it generates greater than 220 pounds per calendar month of hazardous waste.

The hazardous waste must be stored in containers that are in good condition, made of a compatible substance, closed during storage, free of incompatible mixtures, stored in an area with sufficient aisle space, and clearly marked as a "Hazardous Waste" with the date this waste began accumulating. In accordance with 40 CFR 262 and 265, weekly inspections of the hazardous waste storage area are documented on form F-US-028. Inspections of safety equipment, e.g. fire alarm system, fire extinguishers, fire pumps and fire detection systems are conducted on a routine schedule. Emergency training for response personnel and various emergency drills are completed annually. Local emergency response authorities are invited to tour the facility annually and review emergency response procedures.

In addition, under the federal hazardous material transportation law (49 USC 5101) SUS is required to submit to the Department of Transportation an application for a Hazardous Materials Registration Number and pay a fee. The Registration Number for SUS is 060613 550 042V and will expire 06/30/2014. The renewal application is located on the DOT website at <http://hazmat.dot.gov/regs/register/register.htm>. It is required for each facility that offers or transports any shipment of hazardous materials, including hazardous waste that requires a placard and hazardous materials including hazardous waste that are shipped in bulk packaging having capacity equal to or greater than 3,500 gallons.

See the Waste Stream Inventory section for details of waste generation and disposal.

### Universal Wastes

Stanley Electric U.S. CO., INC. (main facility and EL2 plant) generates waste batteries that are classified as Universal Waste (UW) under Ohio Administrative Code 3745-273. SUS is a small quantity handler (<5000 kg of total UW at any one time) of UW. As an SQHUW, SUS may store UW on-site for up to one year. The UW must be labeled with the date the material became a waste, and the type of waste (i.e. Universal Waste – Batteries). Containers for storing UW must be closed, structurally sound, compatible with the UW and lack evidence of leakage, spillage, or damage that could cause leakage. The UW may be transported to a destination facility by any transporter. Manifests are not required for UW and SQHUW are not required to keep records. SQHUW are also not required to notify Ohio EPA of its activity or to obtain an Ohio EPA identification number. SUS must train employees who manage UW on proper handling and emergency procedures. Cadmium containing batteries with cadmium concentrations above one





## Environmental Compliance Manual

PPM and lead-containing batteries with lead concentrations above five PPM must be recycled.



## Universal Wastes (Cont'd)

Fluorescent lamps are generated at SUS. U.S. EPA added fluorescent lamps to its Universal Waste Rule on July 6, 1999. The Ohio EPA has added fluorescent lamps to the Universal Waste Rule. Lamps that are properly collected and recycled do not need to be managed as a hazardous waste. However, if the lamps are discarded, SUS needs to determine if the lamps exhibit any characteristic of a hazardous waste and manage accordingly. Currently, Stanley Electric US Co. Inc. associates are crushing the spent fluorescent bulbs in an approved bulb crushing system and sending the crushed materials off site as a hazardous waste for disposal or recycling.

Mercury containing devices are also a Universal Waste under federal and state rules. The majority of mercury containing devices at Stanley are Mercury Thermostats. These devices are package in a pre-labeled plastic pail and sent off for recycling.

Batteries, bulbs and mercury containing devices from the EI2 plant will be transported to the main facility and recycled/.dispose of with the main facilities Universal waste.

See the Waste Stream Inventory section for details of waste generation and disposal.

## State Regulated Waste

Stanley Electric U.S. CO., INC. generates minimal amounts of medical wastes from plant related injuries. SUS does not have a medical department and all medical emergencies are directed to the local fire and emergency departments. Any medical wastes that are generated should be handled and disposed of properly in the general trash for amounts less than 50 pounds. Steri-Cycle, a medical waste hauler, will remove and properly dispose of medical wastes generated at SUS in excess of the 50 pound limit.

## Solid Waste

The following solid wastes are generated at this facility:

- Aerosol Cans
- Aluminum Dust and Spent Shot (Haz Waste)
- Broken Glass
- Cafeteria Waste
- Defective / Obsolete Parts
- General Trash
- Office Paper
- Recyclable Waste
- Electronic Waste
- Bubble Wrap
- Plastic Film
- Scrap Metal
- Used Oils
- Waste Cardboard
- Waste Glycol and Water
- Waste Toner Cartridges
- Waste Paint Cans
- Waste paint residue from washers
- Waste Resin

Management of aerosol cans depends on whether or not they are RCRA empty. RCRA empty cans are eligible to be recycled as scrap metal or land-filled with general trash. Full or partially full aerosol cans should be collected, labeled, and properly managed as hazardous waste. Full or partially full aerosol cans can be punctured on-site, with the residual material collected and disposed of properly and the cans recycled as RCRA scrap metal. Under the OAC 3745-279 used oil must be stored in containers that are labeled with the words "Used Oil". The containers must be in good condition and any leaks must be stopped, contained and cleaned up. The used



## STANLEY ELECTRIC U.S. CO., INC.

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Telephone (740) 852-5200  
Fax (740) 852-3512

By Certified Mail: No. 7012 0470 0001 1849 2260

November 5, 2013

Ohio Environmental Protection Agency  
DMWM  
P.O. Box 1049  
Columbus, Ohio 43216-1049

RE: RCRA Subtitle C Site Identification form 9029, update of site information to include the Stanley Electric, EL2 plant, 480 E. High Street, London, Ohio 43140

Dear Sir/Madam:

Enclosed please find an updated Site identification form 9029 for the Stanley Electric US, Co, Inc, (SUS) Site ID no. OHD03409358. This plant is located contiguous to the main site and SUS plans on using the current site ID number for this site.

If you have any questions, please give me a call at 740-822-5200, x1062

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael A. Desgranges".

Michael A Desgranges  
Senior Environmental Engineer  
Stanley Electric US Co, Inc..

<b>MAIL THE COMPLETED FORM TO:</b> Ohio EPA, DMWM, P.O. Box 1049, Columbus, OH 43216-1049	<b>Ohio Environmental Protection Agency</b> <b>RCRA SUBTITLE C SITE IDENTIFICATION</b>		For Ohio EPA Use Only
1. Reason for Submittal	<b>Reason for Submittal:</b> <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). <input checked="" type="checkbox"/> To provide subsequent notification (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report for the year		
2. Site EPA ID No.	<b>EPA ID Number:</b> OHD03409358		
3. Site Name	<b>Name:</b> Stanley Electric US, Co., Inc.		
4. Site Location Information	<b>Street Address:</b> 420 E. High Street <b>City, Town, or Village:</b> London <b>County:</b> Madison <b>State:</b> Ohio <b>Country:</b> USA <b>Zip Code:</b> 43140		
5. Site Land Type	<b>Site Land Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. North American Industry Class. System (NAICS) Code(s) for the Site	<b>A. (Primary)</b> 3647 <b>B.</b> <b>C.</b> <b>D.</b>		
7. Site Contact Person:	<b>First Name:</b> Michael <b>MI:</b> A <b>Last Name:</b> Desgranges <b>Title:</b> Senior Environmental Engineer <b>Street or P.O. Box:</b> 420 E. High Street <b>City, Town or Village:</b> London <b>State:</b> Ohio <b>Country:</b> USA <b>Zip Code:</b> 43140 <b>E-mail:</b> mdesgranges@stanleyus.com <b>Phone &amp; Ext.:</b> 740-852-5200 x1062 <b>Fax:</b>		
8. Legal Owner and Operator of the Site  Additional Owners and/or Operators should be listed in the Comment Section or on another copy of this form page.	<b>A. Name of Site's Legal Owner:</b> Stanley Electric US, Co., Inc. <b>Date Became Owner (mm/dd/yyyy):</b> 04/21/1981 <b>Owner Type:</b> <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <b>Street or P.O. Box:</b> 420 E. High Street <b>Phone:</b> 740-852-5200 <b>City, Town, or Village:</b> London <b>State:</b> Ohio <b>Country:</b> USA <b>Zip Code:</b> 43140 <b>B. Name of Site's Operator:</b> Same as above <b>Date Became Operator (mm/dd/yyyy):</b> / / <b>Operator Type:</b> <input type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other <b>Street or P.O. Box:</b> <b>City, Town, or Village:</b> <b>Phone:</b> <b>State:</b> <b>Country:</b> <b>Zip Code:</b>		



9. Type of Regulated Waste Activity (Mark "X" in the appropriate boxes.)

**A. Hazardous Waste Activities**

1. **Generator of Hazardous Waste**  
(choose only one of the following three categories or leave blank if not applicable)
- ☒ a. **Large Quantity Generator (LQG):**  
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste; or
- ☐ b. **Small Quantity Generator (SQG)**  
100 to 1,000 kg/mo (220-2,200 lbs.) of non-acute hazardous waste; or
- ☐ c. **Conditionally Exempt Small Quantity Generator (CESQG):**  
Less than 100 kg/mo of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- ☐ d. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.
- ☐ e. United States Importer of Hazardous Waste
- ☐ f. Mixed Waste (hazardous and radioactive) Generator

2. **Hazardous Waste Report Generator Status**  
(choose one if a Reason for Submittal is the Hazardous Waste Report)

- ☒ a. **Large Quantity Generator (LQG):**  
Greater than 1,000 kg/mo (2,200 lbs.) of non-acute hazardous waste was generated at the site in any one month. or
- ☐ b. **Small Quantity Generator (SQG)**  
In one or more months the site generated greater than 100kg (220 lbs) but in no month did it generate more than 1,000 kg/mo (220-2,200 lbs) of non-acute hazardous waste, or
- ☐ c. **Conditionally Exempt Small Quantity Generator (CESQG):**  
The site generated no more than 100 kg (220 lbs) of non-acute hazardous waste in any one month.
- ☐ d. **Non-Generator**  
The site did not generate any hazardous waste during the calendar year.

For Items 3 through 7, check all that apply:

3. **Transporter of Hazardous Waste**
- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)
- ☐ 4. **Treater, Storer or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.
- ☐ 5. **Recycler of Hazardous Waste (at your site)** Note: A hazardous waste permit may be required for this activity.
- ☐ a. 72-hour Recycler
6. **Exempt Boiler and/or Industrial Furnace**
- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting and Refining Furnace Exemption
- ☐ 7. **Underground Injection Control**
- ☐ 8. **Receives Hazardous Waste from Off-site**

**B. Universal Waste Activities**

- ☐ 1. **Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more). Indicate types of universal waste managed at your site. (check all boxes that apply):**
- |                                 |                          |
|---------------------------------|--------------------------|
|                                 | <u>Managed</u>           |
| a. Batteries                    | <input type="checkbox"/> |
| b. Pesticides                   | <input type="checkbox"/> |
| c. Mercury Containing Equipment | <input type="checkbox"/> |
| d. Lamps                        | <input type="checkbox"/> |
- ☐ 2. **Destination Facility for Universal Waste**  
Note: A hazardous waste permit may be required for this activity.

**C. Used Oil Activities**

1. **Used Oil Transporter**  
Indicate Type(s) of Activity(ies)
- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)
2. **Used Oil Processor and/or Re-refiner**  
Indicate Type(s) of Activity(ies)
- ☐ a. Processor
- ☐ b. Re-refiner
- ☐ 3. **Off-Specification Used Oil Burner**
4. **Used Oil Fuel Marketer -**  
Indicate Type(s) of Activity(ies)
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

**D. Eligible Academic Entities with Laboratories – Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to OAC rules 3745-52-200 through 3745-52-216**

- ☐ 1. Opting into or currently operating under OAC rules 3745-52-200 through 3745-52-216 for the management of hazardous wastes in laboratories. Mark all that apply:
- ☐ a. College or University
- ☐ b. Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university
- ☐ 2. Withdrawing from OAC rules 3745-52-200 through 3745-53-216 for the management of hazardous waste in laboratories

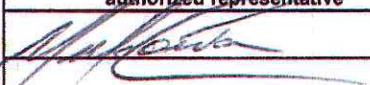
**10. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed.

D001	D011	F003				
D002	D035	F005				
D007	D040					
D008	F001					

**11. Comments**

ID includes any waste generated at contiguous property (EL2 plant, 480 E. High Street)

**12. Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
	Mark Cowan, Executive Vice President	11/04/2013





RE: RCRA ID number for separate operation on contiguous site.

Storch, Melissa

to:

Canter, Paula, 'MDesgranges@stanleyus.com'

06/10/2013 10:43 AM

Cc:

"Flottman, Ruthanne A"

Hide Details

From: "Storch, Melissa" <Melissa.Storch@epa.state.oh.us>

To: "Canter, Paula" <Paula.Canter@epa.state.oh.us>, "'MDesgranges@stanleyus.com'" <MDesgranges@stanleyus.com>

Cc: "Flottman, Ruthanne A" <Ruthanne.Flottman@epa.state.oh.us>

Just to reinforce what Paula said - Please keep in mind that if this is considered one site, then, any waste generated at the new location should be counted toward the main building's waste total (not a separate CESQG). In addition, the warehouse would need to comply with the appropriate generator requirements. If you would like to discuss further, please feel free to give me a call at (614) 728-3887.

Thanks!

Melissa

---

**From:** Canter, Paula

**Sent:** Monday, June 10, 2013 10:35 AM

**To:** 'MDesgranges@stanleyus.com'

**Cc:** Flottman, Ruthanne A; Storch, Melissa

**Subject:** RE: RCRA ID number for separate operation on contiguous site.

Mike, I shared your email with Ruthanne Flottman (DMWM's Notification Coordinator) and Melissa Storch, who supervises the CDO inspectors. We discussed the pros and cons and I consulted a Site ID Guidance document.

Because the access road provides a private right-of-way, the property is contiguous to Stanley Electric, and you estimated that the warehouse would be a CESQG we will not require you to get a separate ID number for the leased warehouse space. If you prefer to get a separate ID for 480 E High that is also an option.

If you decide to stick with one ID (OHD034909358) please submit a subsequent notification using the [RCRA Subtitle C Site Identification form](#) and provide information in the comment section on page 3 stating that the ID includes any waste generated at the contiguous leased warehouse. Once we enter that to our database it will provide a permanent record for a future inspector to access.

If you have any questions please let me know.

Paula Canter

DMWM

614-644-2923

**From:** MDesgranges@stanleyus.com [<mailto:MDesgranges@stanleyus.com>]

**Sent:** Friday, June 07, 2013 2:38 PM

**To:** Canter, Paula

**Subject:** RCRA ID number for separate operation on contiguous site.

Ms Canter, I appreciate you taking the time to discuss the question about contiguous sites this afternoon. As we discussed Stanley Electric US is proposing a new operation in a building that is about 0.5-0.75





miles away from the main building, 480 E. High Street, London, Ohio 43140. Stanley Electric US will operate the facility but the building will be owned by somebody else. Half of the building will be used for warehousing by another company.

I have included a map indicating where the main facility and the proposed building are located. I have drawn a yellow line indicating the location of the access road.

The question, will Stanley Electric US be required to get a separate RCRA ID number for this operation or will the current ID number be applied to this operation.

Thank you for your time in the matter.

Michael Desgranges  
Senior Environmental Engineer  
Stanley Electric U.S. Co., Inc.  
420 E. High Street  
London, Ohio 43140  
Phone 740-852-5200, x1062  
Cell: 614-893-6824





Environmental  
Protection Agency

OHIO ENVIRONMENTAL PROTECTION AGENCY  
50 WEST TOWN STREET, COLUMBUS, OH 43215  
NO EXPOSURE CERTIFICATION FOR EXCLUSION FROM NPDES STORM WATER  
PERMITTING

Submission of this No Exposure Certification constitutes notice that the entity identified in Section A does not require permit authorization for its storm water discharges associated with industrial activity in the State of Ohio under Ohio EPA's Industrial Storm Water General Permit due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity in Section A is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of Ohio Administrative Code (OAC) 3745-39-04(G).

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed instructions for completing this form and obtaining the no exposure exclusion are provided on pages 3 and 4.

**A. Facility Operator Information**

1. Name: Stanley Electric US, Co., Inc. 2. Phone: ( 740 ) 852 - 5200  
3. Email: mdesgranges@stanleyus.com  
4. Mailing Address: a. Street 420 E. High Street  
b. City: London c. State OH d. Zip Code: 43140

**B. Facility/Site Location Information**

1. Facility Name: Stanley Electric US, Co., Inc.  
2. a. Street Address: 420 E. High Street  
b. City: London c. County: Madison  
d. State: Ohio e. Zip Code: 43140

3. Is this a Federal facility? ☐ YES ☒ NO

4. Facility Location: Latitude: 39.899716 Longitude: -83.405698

5. a. Was the facility or site previously covered under an NPDES storm water permit or No Exposure Certification? ☐ YES ☒ NO

b. If yes, enter the Ohio EPA NPDES facility permit number or Ohio EPA No Exposure Certification number: \_\_\_\_\_

6. SIC/Activity Codes: Primary: 3647 Secondary (if applicable): \_\_\_\_\_

7. Total size of site associated with industrial activity: 3.90 acres

8. a. Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? ☐ YES ☒ NO

b. If yes, please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion. However, this information may be used in considering whether storm water discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage.

Less than one acre ☐ One to five acres ☐ More than five acres ☐



**C. Exposure Checklist**

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?  
(Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions  
(1) through (11), you are not eligible for the no exposure exclusion.

	Yes	No
1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Materials or residuals on the ground or in storm water inlets from spills/leaks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Materials or products from past industrial activity	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Material handling equipment (except adequately maintained vehicles)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Materials or products during loading/unloading or transporting activities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Materials or products handled/stored on roads or railways owned or maintained by the discharger	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Waste material (except waste in covered, non leaking containers [e.g., dumpsters])	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Application or disposal of process wastewater (unless otherwise permitted)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater outflow	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**D. Certification Statement**

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from Ohio NPDES storm water permitting.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under OAC 3745-39-04(G)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to the Ohio EPA director and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the Ohio EPA director, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an Ohio NPDES permit prior to any point source discharge of storm water from the facility.

Additionally, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly involved in gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name: Mark Cowan

Print Title: Executive Vice President

Signature: 

Date: 11 04 2013

Mo Day Year

Email: mcowan@stanleyus.com



# Hazardous Waste/Non-Regulated Waste/Material Container & Storage Location Inspection

Hazardous Waste/Non-Regulated Waste 90 day accumulation area

# of HW containers	22
# of N-RW containers	14
Condition of containers	yes good
Are Containers Closed?	yes
Are containers leaking or any evidence of spill?	No
Are containers compatible with the wastes stored in them?	yes
Are containers handled in a manner that prevents leaks/spills?	yes
Are containers labeled with the words "Hazardous Waste" and the accumulation date?	yes
Condition of labels	good
Any containers stored more than 90 days?	No
Is aisle space adequate for passage of emergency equipment?	yes
Are incompatible wastes stored separately?	yes
Emergency Spill Kit	Needs refilled
Emergency Phone	good
Area condition	good

Date	8/15/16
Auditor	3442
Start Time	7:03 am
End Time	8:45 am
HW	Hazardous Waste
N-RW	Non-Regulated Waste

## Hazardous Waste/Non-Regulated Waste Containers/Storage Location Inspection

Location (at Main Facility, 420 E. High Street)	Map Location #	Container Condition /Closure	Label Condition	55 Gallon Limit or full limit	Product Container Condition	Storage Room/area Condition	Notes	Pass/Fail
3D Printer Area (Design)*	33	✓	✓	✓	N/A	A	8	Pass
Die Mold Storage *	11	✓	✓	✓	✓	C	14	Pass
West Side Water Collection	29	✓	✓					Pass
PES Line 1 *	31	✓	✓	✓	✓	A		Pass
PES Line 2 *	32	✓	✓	✓	✓	A		Pass
West Oil Room & Satellite Collection *	13	✓	✓	✓	✓	F	16	Fail
FRP/BMC Material Storage	28				X		19	Fail
UV Line 3 *	1	X	✓	✓	✓	C	1, 16	Fail
Hazardous Room North Storage	2				✓	B		Pass
Deco Paint 1 *	9	X	✓	X	✓	B	1, 12	Fail
UV Line 2/Deco Paint 2 *	24	X	✓	✓	✓	D	1, 16	Fail
Hazardous Room South Collection *	3	✓	✓	X	X	B	11	Fail
Aerosol / Batteries *	6	✓	✓	✓				Pass
Used Lamp Storage (Room 104) *	20	✓	✓	✓				Pass
UV Line 1 *	25	X	X	✓	N/A	B	6, 4	Fail
UV/HC *	26	✓	✓	✓	N/A	A		Pass
Caustic Room *	19	✓	✓	✓	N/A	A		Pass
Smoke Topcoat *	8	✓	✓	✓	✓	D	1, 10	Fail/Pass
Anti-Fog 2 *	12	✓	✓	✓	X	B	1	Fail
In-Fill Hazardous Material Storage	4				✓	C	16	Pass
UV Line 4 *	7	✓	✓	✓	✓	A		Pass
Anti-Fog 1 *	10	X	✓	✓	X	B	1, 12	Fail
HCAF *	15	✓	✓	✓	✓	A		Pass
UV Line 5 *	16	✓	✓	✓	✓	A		Pass
Deco Paint 3 *	23	✓	✓	✓	✓	B		Pass
South Side Water Collection	27	✓	✓	✓				Pass
South Oil Room*	21	X	✓	✓	✓	B	1	Fail
PE1 Satellite Collection and Chemical Storage *	30	✓	✓	✓	✓	D	16	Pass
Mechanical Room (E100/E200)	37	✓	✓		✓	C	16	Pass

Waste container labels are present, correct, and in the right location. Labels are free from waste and facing out to be easily seen. Waste can't exceed 55 gallons (Liquid and Solid). Oil lamp or battery containers cannot be full. Totes must not be full/overflowed. Containers are properly labeled and all bungs, lids, and hoses are closed and sealed correctly. Overall cleanliness and organization of the Area/Room is graded at an A, B, C, D or F level. (These are regulatory rules and must be followed to pass).  
Automatic fails are open waste container. (That includes lids, bungs, and funnels).  
No label present or not correct. Exceeding 55 gallons of waste.  
Area can have liquid and solid containers. (They are separate and do not count together).

Note: \* Indicates Satellite Accumulation Area

Smoke Topcoat corrected issues on 8/15/16  
change to pass

Lucas 8/16/2016





# Hazardous Waste/Non-Regulated Waste/Material Container & Storage Location Inspection

Date	8/15/12
Auditor	3442
Start Time	9:25 am
End Time	9:40 am
HW	Hazardous Waste
N-RW	Non-Regulated Waste

Location (at EL2 facility 480 E. High Street)	Map Location n #	Container Condition	Label Condition	55 Gallon Limit or full limit	Product Container Condition	Storage Room/area Condition	Notes	Pass/Fail
Small containers of Used Batteries-EL2 (3 total)	E1, E2 and E3	✓	✓	✓				Pass
Flammable chemicals and waste storage/cabinets-EL2 *	E4	✓	✓	✓	✓	A		Pass
Aerosol Can Collection- EL2 *	E5	✓	✓	✓				Pass
Recycling area	E6		✓			A		Pass
Used Oil area -EL2	E7	✓	✓	✓	✓	B		Pass
Used Lamp Storage	E8	✓	X	✓				Fail

Label beyond 1 year mark

## Standard Corrective Action Notes:

1. Open waste or product container.
2. Paint liner containing waste/product.
3. Excessive spills throughout the area.
4. Waste label is illegible due to waste.
5. Emergency shower/fire extinguisher blocked.
6. Full container needs moved to 90 day accumulation area.
7. No label on waste container/improper labeling.
8. WIP - Work In Progress in the area.
9. Mop bucket containing waste in the area.
10. Label not visible on waste container.
11. More than one 55-gallon drum collecting the same type of waste in the area.
12. Spills on drum.
13. Date not on full container.
14. Improper BMC material handling.
15. Missing spill kit in area.
16. Improper housekeeping.
17. Used oil or TCE stored in flammable drums
18. Waste Discrepancies from TSDF
19. Area inaccessible / not under normal operations

**Criteria:**  
**L** - Location - Waste container labels are present, correct, and in the right location. Labels are free from waste and facing out to be easily seen.  
**Limit** - Waste can't exceed 55 gallons (Liquid and Solid). Or lamp or battery containers cannot be full. Totes must not be full/overfilled.  
**Container Condition** - Containers are properly labeled and all bungs, lids, and hoses are closed and sealed correctly.  
**Spill** - Overall cleanliness and organization of the Area/Room is graded at an A, B, C, D or F level.  
**Pass/Fail** - (These are regulatory rules and must be followed to pass).  
 \* Automatic fails are open waste container. (That includes lids, bungs, and funnels).  
 \* No label present or not correct. Exceeding 55 gallons of waste.  
 \* Area can have liquid and solid containers. (They are separate and do not count together).

Note: \* indicates Satellite Accumulation Area





# Hazardous Waste/Non-Regulated Waste/Universal Container & Storage Location Inspection

Area	Problem	Corrective Action	First Issued Date	Responsible Person	Completion Date	Possible Corrective Actions for Prevention	Responsible Person / Completion Date

## C.A.R. Items



# LAND DISPOSAL RESTRICTION NOTIFICATION & CERTIFICATION FORM (LDR)

## CHEMTRON CORPORATION

35850 SCHNEIDER COURT, AVON, OH 44011

PHONE (440) 937-6348 FAX (440) 937-6845

Page 1 of 1

GENERATOR NAME STANLEY ELECTRIC US COMPANY INC

EPA ID NUMBER OHD034909358

MANIFEST DOCUMENT NO. 016126036JJK

DATE 04-AUG-2016

PRINT NAME \_\_\_\_\_

SIGNATURE \_\_\_\_\_

\*\*\*PLEASE REFER TO INSTRUCTIONS FOR IMPORTANT INFORMATION AND CODES FOR UHC'S AND CERTIFICATION\*\*\*

### COMPLETE ALL APPLICABLE ITEMS.

LINE	APPROVAL NO.	EPA WASTE NO.(S)	NWW	WW	SUBCAT.	UHC'S	CERT.
1	20140422-006	D001,D007,D035,F003,F005	X		S1,S19	4,149,148,231	A
2	20140422-006	D001,D007,D035,F003,F005	X		S1,S19	4,149,148,231	A
3	20140422-007	D002,D007	X		S3	231	A
4	20140422-008	D040,F001	X			214	A
5	20140422-009	D002,D007	X		S3	231	A
6	20140721-020	D001,D008,D011,F003,F005	X		S1,S11,S19, S20	206,149,240,235	A
7	20150205-006	D009	X		S14	237	A

FOR F001-F005 SPENT SOLVENTS, LIST THE NUMBER NEXT TO THE CONSTITUENT THAT IS PRESENT.

LINE NO.(S)	F001-F005 SOLVENT	LINE NO.(S)	F001-F005 SOLVENT	LINE NO.(S)	F001-F005 SOLVENT
1,2	ACETONE		CYCLOHEXANONE		NITROBENZENE
	BENZENE		O-DICHLOROBENZENE		PYRIDINE
	N-BUTANOL		ETHYL ACETATE		TETRACHLOROETHYLENE
	CARBON DISULFIDE		ETHYL BENZENE	6	TOLUENE
	CARBON TETRACHLORIDE		ETHYL ETHER		1,1,1-TRICHLOROETHANE
	CHLOROBENZENE		ISOBUTANOL		1,1,2-TRICHLOROETHANE
	O-CRESOL		METHANOL		1,1,2-TRICHLORO-1,2,2- TRIFLUOROETHANE
	M-CRESOL		METHYLENE CHLORIDE	4	TRICHLOROETHYLENE
	P-CRESOL	1,2	METHYL ETHYL KETONE		TRICHLOROFLUOROMETHA NE (CFC-11)
	CREOSOLS/CRYSYLIC ACID	1,2,6	METHYL ISOBUTYL KETONE		XYLENE (MIXED ISOMERS)

UHC'S OR "UNDERLYING HAZARDOUS CONSTITUENTS" ARE REGULATED WITHIN THE UNIVERSAL TREATMENT STANDARDS. GENERATOR'S ARE REQUIRED TO IDENTIFY THE UNDERLYING CONSTITUENTS IN WASTE WITH THE FOLLOWING EPA WASTE NUMBERS: D001 (EXCEPT D001 WASTES WHICH CAN BE TREATED BY CMBST), D002, D012-D043. FOR MORE INFORMATION REFER TO 40 C.F.R. PART 268.

